

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
DIVISION

FILED IN CLERK'S OFFICE
U.S.D.C. - Atlanta

JAN 28 2025

Quintavius Johnson
(Print your full name)

Plaintiff *pro se*,

v.

Menzies Aviation

(Print full name of each defendant; an
employer is usually the defendant)

Defendant(s).

KEVIN P. WEIMER, Clerk
By: [Signature] Deputy Clerk

CIVIL ACTION FILE NO.

1:25-CV-0364

(to be assigned by Clerk)

PRO SE EMPLOYMENT DISCRIMINATION COMPLAINT FORM

Claims and Jurisdiction

1. This employment discrimination lawsuit is brought under (check only those that apply):




Title VII of the Civil Rights Act of 1964, 42 U.S.C. §§ 2000e et seq., for employment discrimination on the basis of race, color, religion, sex, or national origin, or retaliation for exercising rights under this statute.

NOTE: To sue under Title VII, you generally must have received a notice of right-to-sue letter from the Equal Employment Opportunity Commission ("EEOC").

_____ Age Discrimination in Employment Act of 1967, 29 U.S.C. §§ 621 et seq., for employment discrimination against persons age 40 and over, or retaliation for exercising rights under this statute.

NOTE: To sue under the Age Discrimination in Employment Act, you generally must first file a charge of discrimination with the EEOC.

 _____ Americans With Disabilities Act of 1990, 42 U.S.C. §§ 12101 et seq., for employment discrimination on the basis of disability, or retaliation for exercising rights under this statute.

NOTE: To sue under the Americans With Disabilities Act, you generally must have received a notice of right-to-sue letter from the EEOC.

_____ Other (describe) _____

2. This Court has subject matter jurisdiction over this case under the above-listed statutes and under 28 U.S.C. §§ 1331 and 1343.

Parties

3. Plaintiff. Print your full name and mailing address below:

Name Quintavius Johnson
Address 100 Lumby Court Apt 4301
Decatur, GA 30034

4. Defendant(s). Print below the name and address of each defendant listed on page 1 of this form:

Name Menzies Aviation
Address 3130 S Martin Street
Atlanta, GA 30344

Name _____
Address _____

Name _____
Address _____

Location and Time

5. If the alleged discriminatory conduct occurred at a location different from the address provided for defendant(s), state where that discrimination occurred:

Menzies Aviation Building, Hartsfield
Jackson International Airport

6. When did the alleged discrimination occur? (State date or time period)

Earliest: 9/23/2024

Latest: 10/16/2024

Ongoing: Continuing Action

Administrative Procedures

7. Did you file a charge of discrimination against defendant(s) with the EEOC or any other federal agency? ☒ Yes ☐ No

If you checked "Yes," attach a copy of the charge to this complaint.

8. Have you received a Notice of Right-to-Sue letter from the EEOC?

☒ Yes ☐ No

If you checked "Yes," attach a copy of that letter to this complaint and state the date on which you received that letter:

10/28/2024

9. If you are suing for **age discrimination**, check one of the following:

☐ 60 days or more have elapsed since I filed my charge of age discrimination with the EEOC

☐ Less than 60 days have passed since I filed my charge of age discrimination with the EEOC

10. If you were employed by an agency of the State of Georgia or unsuccessfully sought employment with a State agency, did you file a complaint against defendant(s) with the Georgia Commission on Equal Opportunity?

_____ Yes

_____ No

☒ Not applicable, because I was not an employee of, or applicant with, a State agency.

If you checked "Yes," attach a copy of the complaint you filed with the Georgia Commission on Equal Opportunity and describe below what happened with it (i.e., the complaint was dismissed, there was a hearing before a special master, or there was an appeal to Superior Court):

11. If you were employed by a Federal agency or unsuccessfully sought employment with a Federal agency, did you complete the administrative process established by that agency for persons alleging denial of equal employment opportunity?

_____ Yes

_____ No

☒ Not applicable, because I was not an employee of, or applicant with, a Federal agency.

If you checked "Yes," describe below what happened in that administrative process:

Nature of the Case

12. The conduct complained about in this lawsuit involves (check only those that apply):

☐ failure to hire me
☐ failure to promote me
☐ demotion
☐ reduction in my wages
☒ working under terms and conditions of employment that differed from similarly situated employees
☒ harassment
☒ retaliation
☒ termination of my employment
☐ failure to accommodate my disability
☐ other (please specify) _____

13. I believe that I was discriminated against because of (check only those that apply):

☐ my race or color, which is _____
☐ my religion, which is _____
☒ my sex (gender), which is ☒ male ☐ female
☐ my national origin, which is _____
☐ my age (my date of birth is _____)
☒ my disability or perceived disability, which is:

Mental Health

☐ my opposition to a practice of my employer that I believe violated the federal anti-discrimination laws or my participation in an EEOC investigation

☒ other (please specify) Due to Being an heterosexual male, I was subject to more labor fit roles.

14. Write below, as clearly as possible, the essential facts of your claim(s). Describe specifically the conduct that you believe was discriminatory or retaliatory and how each defendant was involved. Include any facts which show that the actions you are complaining about were discriminatory or retaliatory. Take time to organize your statements; you may use numbered paragraphs if you find that helpful. Do not make legal arguments or cite cases or statutes.

This image shows a single sheet of white paper with horizontal ruling lines. The lines are evenly spaced and run across the width of the page. There is no text or other markings on the paper.

(Attach no more than five additional sheets if necessary; type or write legibly only on one side of a page.)

15. Plaintiff ✓ still works for defendant(s)
no longer works for defendant(s) or was not hired

16. If this is a disability-related claim, did defendant(s) deny a request for reasonable accommodation? _____ Yes _____ No

If you checked "Yes," please explain: _____

17. If your case goes to trial, it will be heard by a judge unless you elect a jury trial. Do you request a jury trial? ✓ Yes _____ No

Request for Relief

As relief from the allegations of discrimination and/or retaliation stated above, plaintiff prays that the Court grant the following relief (check any that apply):

✓ Defendant(s) be directed to issue an apology,

✓ pay and provide damages due to financial

✓ Money damages (list amounts) ~~1000~~ 10 Million Dollars

✓ Costs and fees involved in litigating this case

✓ Such other relief as may be appropriate

Hardships
and emotional
distress
and
defamation
of
Character

PLEASE READ BEFORE SIGNING THIS COMPLAINT

Before you sign this Complaint and file it with the Clerk, please review Rule 11 of the Federal Rules of Civil Procedure for a full description of your obligation of good faith in filing this Complaint and any motion or pleading in this Court, as well as the sanctions that may be imposed by the Court when a litigant (whether plaintiff or defendant) violates the provisions of Rule 11. These sanctions may include an order directing you to pay part or all of the reasonable attorney's fees and other expenses incurred by the defendant(s). Finally, if the defendant(s) is the prevailing party in this lawsuit, costs (other than attorney's fees) may be imposed upon you under Federal Rule of Civil Procedure 54(d)(1).

Signed, this 28 day of January, 20 25



(Signature of plaintiff *pro se*)

Quintavius Johnson

(Printed name of plaintiff *pro se*)

100 Lumby Court Apt 4301

(street address)

Decatur, GA 30034

(City, State, and zip code)

Quintavius Johnson10@gmail.com

(email address)

404-641-3552

(telephone number)

EEOC Form 5 (07/24)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974.

See attached Privacy Act Statement and other information before completing this form.

CHARGE PRESENTED TO:

AGENCY CHARGE NO.

EEOC

410-2025-00028

Name (indicate Mr., Ms., Mrs., Miss, Mx., Dr., Hon., Rev.): Quintavius Johnson

Home Phone: 404-641-3552

Year of Birth: 1988

Street Address: 100 Lumby Court Apt 4301

DECATUR, GA 30034

Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency that I believe discriminated against me or others.

Name: Menzies Aviation

No. Employees, Members: 501+ Employees

Phone No.:

Street Address: 3130 S MARTIN ST

ATLANTA, GA 30344

Name:

No. Employees, Members:

Phone No.:

Street Address:

DISCRIMINATION BASED ON:

Disability, Sex

DATE(S) DISCRIMINATION TOOK PLACE

Earliest: 09/23/2024

Latest: 10/03/2024

Continuing Action

THE PARTICULARS ARE:

I began working for the above-named employer on June 3, 2024, as a Safety, Security and Environmental Supervisor and Trainer. On September 18, 2024, I met with Quisqueya Zeo, Human Resources, and Glenroy Marshall, Safety, Security and Environmental Training Manager after Mr. Marshall complained I was insubordinate. At the conclusion of the meeting, I stated that I was leaving for mental health reasons. Late in the evening I received an email from Mr. Marshall stating that he would see me the following day. I was out on vacation from September 19, 2024, through September 22, 2024. When I returned to work on September 24, 2024, Gary Cook, Director and Mr. Marshall, stated I needed a note from my physician to return to work and was sent home. On October 1, 2024, I emailed Patricia Gibson, Leave of Absence and Return to Work Specialist, and informed her that I'd like to come back to work. On October 2, 2024, I met with Ms. Zeo and Mr. Cook who advised that I needed to provide a note from the hospital I was treated at for mental health from September 19, 2024, through September 22, 2024, at which time I informed them I was out on approved vacation.

While I was being onboarded by Shelia McKinley, Talent Acquisition Specialist, she approved my leave.

EEOC Form 5 (07/24)

I believe that I have been discriminated against in that I was regarded as disabled in violation of Title I of the Americans with Disabilities Act of 1990, as amended and because of my sex (male), sexual orientation (heterosexual), and in retaliation for opposing unlawful employment actions in violation of Title VII of the Civil Rights Act of 1964, as amended.

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Digitally Signed By: Quintavius Johnson

10/04/2024

Charging Party Signature & Date

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information, and belief.

Signature of Complainant

Subscribed and sworn to before me this date: _____

EEOC Form 5 (07/24)

CHARGE OF DISCRIMINATION

This form is affected by the Privacy Act of 1974.

See attached Privacy Act Statement and other information before completing this form.

CHARGE PRESENTED TO:

EEOC

AGENCY CHARGE NO.

410-2025-00438

Name (indicate Mr., Ms., Mrs., Miss, Mx., Dr., Hon., Rev.): Quintavius Johnson

Home Phone: 404-641-3552

Year of Birth: 1988

Street Address: 100 Lumby Court Apt 4301

DECATUR, GA 30034

Named below is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency that I believe discriminated against me or others.

Name: Menzies Aviation

No. Employees, Members: 501+ Employees

Phone No.:

Street Address: 3130 S MARTIN ST

ATLANTA, GA 30344

Name:

No. Employees, Members:

Phone No.:

Street Address:

DISCRIMINATION BASED ON:

Disability, Retaliation

DATE(S) DISCRIMINATION TOOK PLACE

Earliest: 10/04/2024

Latest: 10/16/2024

Continuing Action

THE PARTICULARS ARE:

I. I was hired by the above employer on or about June 3, 2024 as an SSE Supervisor & Training. I am a straight black male. My direct supervisor and my counterpart are both gay males. During my employment, I have observed the preferential treatment of my gay counterpart by our gay supervisor. I have been assigned less favorable, more laborious duties that are not part of my regular job duties. I made complaints about the difference in treatment I was being subjected to, yet no effective, remedial action was taken. On or about Oct. 4, 2024, I filed an EEOC charge alleging discrimination based on disability and sex (sexual orientation). Since then, I have been subjected to further retaliation in the form of disciplinary actions including write ups and unpaid suspensions. I have been isolated and continued to be asked to perform duties that I am not responsible for. As of Oct. 16, 2024, I was sent home after I was falsely accused of misconduct when instead, I reasonably questioned why I was being asked to do duties I was not responsible for yet again. I believe that I am being set up to be terminated based on my sexual orientation and in retaliation for my complaints about discrimination.

II. I believe that I am being retaliated against for engaging in protected activity in violation of Title VII of the Civil Rights Act of 1964, as amended and the Americans with Disabilities Act of 1990, as amended.

CP Enclosure with EEOC Form 5 (06/24)

PRIVACY ACT STATEMENT

Under the Privacy Act of 1974, Pub. Law 93-579, authority to request personal data and its uses are:

1. **FORM NUMBER/TITLE/DATE.** EEOC Form 5, Charge of Discrimination (06/24).
2. **AUTHORITY.** 42 U.S.C. 2000e-5(b), 29 U.S.C. 211, 29 U.S.C. 626, 42 U.S.C. 12117, 42 U.S.C. 2000ff-6.
3. **PRINCIPAL PURPOSES.** The purposes of a charge, taken on this form or otherwise reduced to writing (whether later recorded on this form or not) are, as applicable under the EEOC anti-discrimination statutes (EEOC statutes), to preserve private suit rights under the EEOC statutes, to invoke the EEOC's jurisdiction and, where dual-filing or referral arrangements exist, to begin state or local proceedings.
4. **ROUTINE USES.** This form is used to provide facts that may establish the existence of matters covered by the EEOC statutes (and as applicable, other federal, state or local laws). Information given will be used by staff to guide its mediation and investigation efforts and, as applicable, to determine, conciliate and litigate claims of unlawful discrimination. This form may be presented to or disclosed to other federal, state or local agencies as appropriate or necessary in carrying out EEOC's functions. A copy of this charge will ordinarily be sent to the respondent organization against which the charge is made.
5. **WHETHER DISCLOSURE IS MANDATORY; EFFECT OF NOT GIVING INFORMATION.** Charges must be reduced to writing and should identify the charging and responding parties and the actions or policies complained of. Without a written charge, EEOC will ordinarily not act on the complaint. Charges under Title VII, the ADA or GINA must be sworn to or affirmed (either by using this form or by presenting a notarized statement or unsworn declaration under penalty of perjury); charges under the ADEA should ordinarily be signed. Charges may be clarified or amplified later by amendment. It is not mandatory that this form be used to make a charge.

NOTICE OF RIGHT TO REQUEST SUBSTANTIAL WEIGHT REVIEW

Charges filed at a state or local Fair Employment Practices Agency (FEPA) that dual-files charges with EEOC will ordinarily be handled first by the FEPA. Some charges filed at EEOC may also be first handled by a FEPA under worksharing agreements. You will be told which agency will handle your charge. When the FEPA is the first to handle the charge, it will notify you of its final resolution of the matter. Then, if you wish EEOC to give Substantial Weight Review to the FEPA's final findings, you must ask us in writing to do so *within 15 days* of your receipt of its findings. Otherwise, we will ordinarily adopt the FEPA's finding and close our file on the charge.

NOTICE OF NON-RETALIATION REQUIREMENTS

Please **notify** EEOC or the state or local agency where you filed your charge **if retaliation is taken against you or others** who oppose discrimination or cooperate in any investigation or lawsuit concerning this charge. Under Section 704(a) of Title VII, Section 4(d) of the ADEA, Section 503(a) of the ADA, Section 207(f) of GINA, and 42 USC 2000gg-2(f)(1) of the PWEFA it is unlawful for an *employer* to discriminate against present or former employees or job applicants, for an *employment agency* to discriminate against anyone, or for a *union* to discriminate against its members or membership applicants, because they have opposed any practice made unlawful by the statutes, or because they have made a charge, testified, assisted, or participated in any manner in an investigation, proceeding, or hearing under the laws. The Equal Pay Act has similar provisions and Section 503(b) of the ADA prohibits coercion, intimidation, threats or interference with anyone for exercising or enjoying, or aiding or encouraging others in their exercise or enjoyment of, rights under the Act.

EEOC Form 5 (07/24)

I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.

I declare under penalty of perjury that the above is true and correct.

Charging Party Signature & Date

NOTARY – When necessary for State and Local Agency Requirements

I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information, and belief.

Signature of Complainant

Subscribed and sworn to before me this date: _____



U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

Atlanta District Office
100 Alabama Street, SW, Suite 4R30
Atlanta, GA 30303
1-800-669-4000
Website: www.eeoc.gov

DETERMINATION AND NOTICE OF RIGHTS

(This Notice replaces EEOC FORMS 161, 161-A & 161-B)

To: Quintavius Johnson
100 Lumby Court Apt 4301
Decatur, GA 30034
Charge No: 410-2025-00028

EEOC Representative and email: MICHELLE WRIGHT
Investigator
michelle.wright@eeoc.gov

DETERMINATION OF CHARGE

The EEOC issues the following determination: The EEOC will not proceed further with its investigation and makes no determination about whether further investigation would establish violations of the statute. This does not mean the claims have no merit. This determination does not certify that the respondent is in compliance with the statutes. The EEOC makes no finding as to the merits of any other issues that might be construed as having been raised by this charge.

NOTICE OF YOUR RIGHT TO SUE

This is official notice from the EEOC of the dismissal of your charge and of your right to sue. If you choose to file a lawsuit against the respondent(s) on this charge under federal law in federal or state court, **your lawsuit must be filed WITHIN 90 DAYS of your receipt of this notice.** Receipt generally occurs on the date that you (or your representative) view this document. You should keep a record of the date you received this notice. Your right to sue based on this charge will be lost if you do not file a lawsuit in court within 90 days. (The time limit for filing a lawsuit based on a claim under state law may be different.)

If you file a lawsuit based on this charge, please sign in to the EEOC Public Portal and upload the court complaint to charge 410-2025-00028.

On behalf of the Commission,

I. Daniel-

Edward Anance

Darrell E. Graham
District Director

Digitally signed by I. Daniel-
Edward Anance

Date: 2024.10.28 12:45:33

[Handwritten signature: I. Daniel-Edward Anance] For

Cc:

Margarita Pichardo
3130 S Martin St
Atlanta, GA 30344

Zachary Sikora
Foley & Lardner LLP
321 N Clark St Ste 3000
Chicago, IL 60654

Please retain this notice for your records.

United States District Court
for the
Northern District of Georgia
Atlanta Division

Quintavius Johnson
Plaintiff,

v

Case Number:

Menzies Aviation
Defendant,

Motion For The Opportunity To Find An
Attorney To Represent Me Due To The
Nature Of This Case.